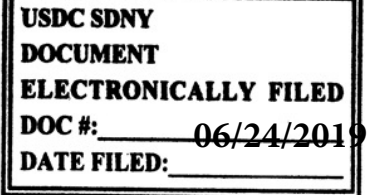




MATTHEW L. SCHWARTZ  
Tel.: (212) 303-3646  
E-mail: mlschwartz@bsfllp.com

June 21, 2019



**BY ECF**

Honorable Katharine H. Parker  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Suite 1950  
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.*,  
Case No. 15 Civ. 5345 (AJN) (KHP)**

***City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.*,  
Case No. 19 Civ. 2645 (AJN) (KHP)**

Dear Judge Parker:

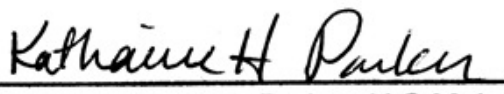
We represent the City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”) and write to provide an update on the progress of the parties’ discussions, in these cases with respect to the overlap of discovery between the two actions and the parties’ proposed protective order. [See 19 Civ. 2645, ECF No. 43 (extension); ECF No. 41 at 3 (original Order).]

The defendants in the *Ablyazov* matter have now agreed that documents they produced as confidential or attorneys’ eyes only may be reproduced in the *Sater* matter, subject to their continued confidentiality. Certain of the defendants in one case or the other have requested conditions on the use of such documents that have not yet been agreed-to by all the other defendants, however.

Given that all counsel are working in good faith to reach agreement on the form and scope of the orders to be entered in these cases, the Kazakh Entities respectfully request that the parties be given until next Friday, June 28, to submit a proposed order or orders. Hopefully, any such order(s) will be on consent, but if the parties are unable to reach agreement by next week, the Kazakh Entities intend to submit their own proposed order so that discovery in the *Sater* action is not needlessly delayed. The defendants in the *Sater* matter consent to this request; at the time of filing, the *Ablyazov* defendants had not taken any position.

Thank you for your consideration of this request.

**APPLICATION GRANTED**

  
**Hon. Katharine H. Parker, U.S.M.J.**  
**06/24/2019**

Respectfully,

/s/ Matthew L. Schwartz  
Matthew L. Schwartz

BOIES SCHILLER FLEXNER LLP